

Exhibit D

Proposed Order

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

as representative of

THE COMMONWEALTH OF PUERTO
RICO, *et al.*

Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**[PROPOSED] ORDER GRANTING MOTION OF THE OFFICIAL COMMITTEE OF
RETIRED EMPLOYEES AND ITS PROFESSIONALS TO COMPEL THE
PUERTO RICO DEPARTMENT OF TREASURY TO
COMPLY WITH THE FIRST AND SECOND AMENDED ORDERS
SETTING PROCEDURES FOR INTERIM COMPENSATION
AND REIMBURSEMENT OF EXPENSES OF PROFESSIONALS**

Upon consideration of the *Motion of the Official Committee of Retired Employees and its Professionals to Compel the Puerto Rico Department of Treasury to Comply with the First and Second Amended Orders Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* (the “**Motion**”),² the Court has found and determined that: (i) the Court

¹ The Debtors in these jointly-administered PROMESA title III cases, along with each Debtor’s respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are: (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric and Power Authority (Bankruptcy Case No. 17 BK 4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Capitalized terms used but not otherwise defined herein have the meanings given to them in the Motion.

has jurisdiction to consider the Motion and the relief requested therein; (ii) venue is proper before this Court pursuant to PROMESA section 307(a), 48 U.S.C. § 2167(a); (iii) due and proper notice of the Motion has been provided under the particular circumstance and no other further notice need be provided; and, (iv) the legal and factual bases set forth in the Motion establish just cause for the relief granted herein.

Accordingly, it is hereby ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. The Puerto Rico Department of Treasury is directed to comply with the Court's *First Amended Order Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* (Dkt. 1715), the Court's *Second Amended Order Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* (Dkt. 3269), and the Court's Orders approving each of the Retiree Committee Professionals' first eleven Interim Fee Applications (*see* Dkt. 1994, 3279, 3656, 4200, 5654, 7670, 8189, 9046, 9488, 12157, 13150, 13824, 14925, 15971, 17646), and to pay all Improper Withholdings to the Retiree Committee Professionals, on or before October 15, 2021.
3. This Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Dated: _____, 2021

Honorable Laura Taylor Swain
United States District Judge